

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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This document applies to:

ETHICON WAVE 8 CASES LISTED IN  
PLAINTIFFS' EXHIBIT A (Doc. 6822)

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**ETHICON DEFENDANTS' NOTICE OF ADOPTION OF WAVE 1 *DAUBERT*  
RESPONSE REGARDING JOYE K. LOWMAN, M.D. FOR WAVE 8**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Joye K. Lowman, M.D. in the Wave 8 cases identified in Exhibit A to their Notice. *See* Doc. 6822. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Joye K. Lowman, M.D. for Ethicon Wave 1 (Doc. 2161) as their response for Wave 8.<sup>1</sup> Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1 response briefing.

Respectfully submitted,

/s/ William M. Gage

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<sup>1</sup> Plaintiffs refer to Doc. Nos. 2449 and 2452, which were titled "Plaintiffs' Motion to Exclude the General Opinion Testimony of Joye K. Lowman, M.D. As Well As Her Specific Opinions In The Case Of Pamela Bailey (Case No. 2:12-cv-1700). The filing of a motion to exclude case-specific opinions for a single plaintiff in the master docket (2:12-md-2327) is improper and does not require a response.

/s/ Susan M. Robinson

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Counsel for Defendants Ethicon, Inc.,

and Johnson & Johnson

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
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